

**To:** Hellyer, Yvette[Hellyer.Yvette@epa.gov]  
**Cc:** McFadden, Kelly[McFadden.Kelly@epa.gov]; Miles, James[miles.james@epa.gov]  
**From:** Schulze, Chad  
**Sent:** Tue 11/8/2016 7:24:57 PM  
**Subject:** RE: Black Flag Disposable Fly Traps

Thanks Yvette,

Yeah, this is an interesting case. My concern is that, **Ex. 5 - Deliberative Process**

## Ex. 5 - Deliberative Process

Please let me know if I can assist in organizing the meeting with OPP/BPPD.

Sincerely,

Chad

\*\*\*\*\*

Chad C. Schulze  
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EPA DIVE UNIT:

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**From:** Hellyer, Yvette  
**Sent:** Tuesday, November 08, 2016 9:47 AM  
**To:** Schulze, Chad <Schulze.Chad@epa.gov>  
**Cc:** McFadden, Kelly <McFadden.Kelly@epa.gov>; Miles, James <miles.james@epa.gov>  
**Subject:** RE: Black Flag Disposable Fly Traps

Hi Chad,

James and I have consulted on your recent email about the preliminary analysis conducted on the Black Flag fly traps. Thank you for bringing us up to date – this is indeed very interesting. Bottom line: we need OPP's weigh-in.

According to Wikipedia, 2-Piperidinone (CAS 675-20-7) is a chemical compound classified as Lactam – an intermediate in the preparation of other chemicals.

From PTEB's experience, **Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process** We recommend  
**Ex. 5 - Deliberative Process** Perhaps a  
teleconference following an email. BPPD needs to determine **Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process** We believe it **Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process**

Please let us know if you have any further questions or need further assistance.

**Yvette P. Hellyer**

OECA/OCE/WCED

Pesticide and Tanks Enforcement Branch

202/564-4033

**From:** Schulze, Chad  
**Sent:** Friday, October 28, 2016 11:23 AM  
**To:** Hellyer, Yvette <Hellyer.Yvette@epa.gov>  
**Cc:** McFadden, Kelly <McFadden.Kelly@epa.gov>; Miles, James <miles.james@epa.gov>  
**Subject:** FW: Black Flag Disposable Fly Traps

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Hi Yvette,

We have an interesting development in the Black Flag Fly Trap case. The lab provided their preliminary analysis of the Fly Traps this week and did not find Indole or Heptyl Butyrate. Based on the GCMS graph, they believe the product contains 2-Piperidinone (CAS 675-20-7). This substance is not registered as a pesticide (see OPPIN screen shot below).

The lab must purchase standards for this substance to run a quantitative analysis. These standard have a cost so I just wanted to verify with HQ's that you need/want to know the concentrations of 2-Piperidinone in the fly trap.

Let me know if you'd like the lab to proceed with the quantitative analysis of the product and we'll work out the costs of the standards.

Sincerely,

Chad

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**From:** Firman, Mike (AGR) [<mailto:MFIRMAN@agr.wa.gov>]  
**Sent:** Tuesday, October 25, 2016 10:53 AM  
**To:** Schulze, Chad <[Schulze.Chad@epa.gov](mailto:Schulze.Chad@epa.gov)>  
**Subject:** Fly Traps

The chemical they are using is 2-piperidinone.

Mike Firman

WSDA Chemical and Hop Laboratory



Use Ingredient Query to search for various types of Pesticide Ingredients by ingredient PC code, Registrations, pesticide category and type, reregistration case, reregistration list, site, and pesticide name. You may select multiple values from any list to broaden your search. Use the Windows conventions of Shift-click or Ctrl-click. Short lists are presented on the screen. Use the magnifying glass to the right of the select box. If you wish to search for other pesticide-related information, click on the Search Menu.

PC Code:  (leading zeroes are not assumed)

From:  To:  (1)

675-20-7

2-Piperidinone

Active  
Inert

ACARICIDE	
ALGAECIDE	⬆
ALGICIDE	⬇
ANTIBIOTIC	

Antimicrobial  
Biochemical  
Conventional Chemical  
Inert